

**To:** Emilsson, Gunnar[EmilssonGR@cdmsmith.com]; Sanchez, Brian[sanchez.brian@epa.gov]  
**Cc:** Repine, Damon[RepineDL@cdmsmith.com]  
**From:** Cirian, Mike  
**Sent:** Mon 2/27/2017 9:21:53 PM  
**Subject:** RE: CFAC SAP Modification #9

Thanks Gunnar,

That sounds good to me. I'll wait to see if Brian has anything to add before I pass the info on to Mike Ritorto.

Mike Cirian, PE

Libby On-site Project Manager

US EPA

108 East 9th Street

Libby, MT 59923

(406) 293-6194 Office

**From:** Emilsson, Gunnar [mailto:EmilssonGR@cdmsmith.com]  
**Sent:** Monday, February 27, 2017 11:20 AM  
**To:** Cirian, Mike <Cirian.Mike@epa.gov>; Sanchez, Brian <sanchez.brian@epa.gov>  
**Cc:** Repine, Damon <RepineDL@cdmsmith.com>  
**Subject:** FW: CFAC SAP Modification #9

Hello Mike and Brian:

I had Erin take a look at the proposed SAP modification. I think she has a good point. There

may be additional wells that exceed the most conservative screening value. We could raise this on the forthcoming call.

Let me know if you have any questions.

**Gunnar Emilsson, P.G., P.E., BCEE**

Project Manager

CDM Smith

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**From:** Formanek, Erin  
**Sent:** Monday, February 27, 2017 10:55 AM  
**To:** Emilsson, Gunnar <[EmilssonGR@cdmsmith.com](mailto:EmilssonGR@cdmsmith.com)>  
**Subject:** RE: CFAC SAP Modification #9

Gunnar,

Typically, total cyanide is analyzed and if there are exceedances of screening values, then analysis of samples for free cyanide would be appropriate. However, I do have some criticism of the mod. It is stated that locations that have one or more exceedances of the DEQ-7 value for cyanide will have analysis of total and free cyanide in the next round of sampling. DEQ-7 is not the most conservative screening value, the EPA tapwater RSL is the lowest value. Because we

have not yet been able to view the data, I am not certain if there are other locations that should be identified for free cyanide analysis when using the most conservative screening value. There is a large difference between the DEQ-7 value (200 ug/L) and the EPA tapwater RSL (0.15 ug/L). I expect there are other locations that should have this analysis performed. Why has DEQ-7 been chosen to select locations? Rationale should be provided in the mod for the selection of DEQ-7 as the screening level of choice.

Please let me know if it would be helpful to discuss this.

Thank you,

Erin

**From:** Emilsson, Gunnar  
**Sent:** Monday, February 27, 2017 9:31 AM  
**To:** Formanek, Erin <[formanek@cdmsmith.com](mailto:formanek@cdmsmith.com)>  
**Subject:** FW: CFAC SAP Modification #9

Hi Erin:

Any thoughts on free vs. total cyanide analysis. The question in the attached request seems to be one of risk.

Thanks,

Gunnar

**From:** Cirian, Mike [<mailto:Cirian.Mike@epa.gov>]  
**Sent:** Friday, February 24, 2017 12:20 PM  
**To:** Sanchez, Brian <[sanchez.brian@epa.gov](mailto:sanchez.brian@epa.gov)>  
**Cc:** Emilsson, Gunnar <[EmilssonGR@cdmsmith.com](mailto:EmilssonGR@cdmsmith.com)>  
**Subject:** FW: CFAC SAP Modification #9

Hi Brian,

Here is the Mod I talked to you about. Please let me know if you have any questions or concerns.

Thanks

Mike

Mike Cirian, PE

Libby On-site Project Manager

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**From:** Michael Ritorto [<mailto:mritorto@rouxinc.com>]

**Sent:** Tuesday, February 21, 2017 3:50 PM

**To:** Cirian, Mike <[Cirian.Mike@epa.gov](mailto:Cirian.Mike@epa.gov)>

**Cc:** Hoogerheide, Roger <[Hoogerheide.Roger@epa.gov](mailto:Hoogerheide.Roger@epa.gov)>; [John.Stroiazso@glencore-ca.com](mailto:John.Stroiazso@glencore-ca.com);  
Steve Wright - CFAC <[swright@cfaluminum.com](mailto:swright@cfaluminum.com)>; [lidewitt@mt.gov](mailto:lidewitt@mt.gov); [cowen@mt.gov](mailto:cowen@mt.gov);  
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<[ljensen@rouxinc.com](mailto:ljensen@rouxinc.com)>

**Subject:** CFAC SAP Modification #9

Hello Mike,

Please see the attached SAP Modification #9 which describes additional sampling that

CFAC/Roux is proposing to complete during the next groundwater and surface water sampling event. Please let me know if you have any questions.

**Michael Ritorto**

**Senior Hydrogeologist | ROUX ASSOCIATES, INC.**

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